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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 8, 1993

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

93-235

Dear Ms. Searcy:

Enclosed is an original and 11 copies of the Comments of Thomson Consumer Electronics, Inc. in response to the Notice of Proposed Rulemaking, ET Docket No. 93-235 concerning the amendment of the commission's rules to provide additional frequencies for cordless telephones.

Sincerely,

Wray C. Hiser

Enclosure

**Thomson Consumer Electronics, Inc.**

Suite 601, 1200 19th Street, N.W., Washington, D.C. 20036

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the matter of

Amendment of Parts 15 and 90  
of the Commission's Rules to  
Provide Additional Frequencies  
for Cordless Telephones

ET Docket No. 93-235  
RM-8094

COMMENTS OF THOMSON CONSUMER ELECTRONICS, INC.

Thomson Consumer Electronics, Inc. ("Thomson") hereby submits its Comments in response to the Notice of Proposed Rulemaking ("the Notice") filed by the Telecommunications Industry Association and adopted by the Commission. In the Notice, the Commission proposed to make available 15 additional channel pairs near 44 MHz and 49 MHz for use by cordless telephones. The Consumer Electronics Group of the Electronics Industry Association ("EIA/CEG") has filed comments generally supporting this proposal. Thomson also supports the allocation of these frequencies and offers the following brief comments.

Thomson is a leading manufacturer and marketer of consumer electronics products, including television receivers and cordless telephones. Thomson welcomes the addition of new cordless phones frequencies as a way to alleviate some of the congestion that occurs at the currently used frequencies due to the increasing number of

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cordless phones in use. As is the EIA/CEG, however, Thomson is concerned that under certain conditions cordless telephones operating at the proposed new frequencies may cause interference in the operation of television receivers and VCRs.

The conditions most likely to cause interference occur when a cordless phone is placed or used very near a TV or VCR. Interference occurs because the cordless phone operating frequency falls within the IF passband used by the TV or VCR. Preliminary tests conducted by Thomson show that this interference occurs only when the cordless phone is used in close proximity to the TV or VCR. Thomson therefore supports the required inclusion of a cautionary note in the instruction manuals of cordless telephones. Thomson urges the Commission to allow cordless phone manufacturers the ability to choose the language that they believe conveys the most information in a form that will be readily received and understood by the consumer. As an example, Thomson proposes to use the following, or similar, note in its cordless phone instruction books. Again, Thomson is not specifically requesting the Commission to adopt its language, but only offers it as a means to illustrate Thomson's desire to retain flexibility in the particular choice of words that is used.

Some cordless telephones operate at frequencies that may cause interference to nearby TVs and VCRs. To minimize or prevent such interference, do not place the base of your cordless phone near or on top of a TV or VCR. If you

experience interference during operation of your TV or VCR that is caused by a cordless phone, moving the phone farther away from the TV or VCR will often reduce or eliminate the interference.

Thomson thanks the Commission for its consideration of the foregoing comments and is confident the Commission will act quickly and in the best interest of the consumer.

Respectfully submitted,

Thomson Consumer Electronics, Inc.

By Way C. Klein  
Title Associate General Counsel

November 8, 1993